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January 21, 2022

**VIA ECF**

Honorable Lewis J. Liman  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: Salma Elhassa v. Hallmark Aviation Services, L.P.**  
No. 21 Civ. 9768 (LJL)

Dear Judge Liman:

This firm represents Defendant Hallmark Aviation Services, L.P. in the above-referenced matter. Defendant writes to respectfully request a 14-day extension of time respond to the Complaint from January 27, 2022 until February 10, 2022. Plaintiff consents to this request, which is Defendant's second request for an extension of time to respond to the Complaint.<sup>1</sup>

This request is necessitated because one of defense counsel's family had recently contracted Covid-19 and, as such, spent of much of his time attending to his household. Accordingly, Defendant requires additional time to investigate Plaintiff's allegations and formulate a response to the Complaint.

Upon information and belief, this extension will not affect any other scheduled dates in this litigation. For the reasons set forth above, Defendant respectfully requests that its time to respond to the Complaint be extended until February 10, 2022.

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/  
Eli Z. Freedberg  
Gary Moy

Cc: Counsel of record (via ECF)

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<sup>1</sup> Defendant previously requested a 30-day extension of time to respond to the Complaint from December 28, 2021 until January 27, 2022.